

November 6, 1998

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: ISSUANCE OF AMENDMENT FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2 (TAC NO. MA1778) AND UNIT NO. 3 (TAC NO. MA1779)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 144 to Facility Operating License No. NPF-10 and Amendment No. 135 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated May 11, 1998, as supplemented by letter dated October 9, 1998.

The amendment revises the TS to implement 10 CFR Part 50, Appendix J, Option B for performance-based reactor containment leakage testing.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,
Original Signed By
James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-361
and 50-362

Enclosures: 1. Amendment No. 144 to NPF-10
2. Amendment No. 135 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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DOCUMENT NAME: SOMA1778.AMD

OFC	PDIV-2/PM	PDIV-2/LA	SCSB/C	OGC	PDIV-2/PM
NAME	MGray	EPeyton	CBerlinger	S. MARTZ	JClifford
DATE	10/26/98	10/21/98	10/22/98	10/20/98	11/15/98

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Mr. Harold B. Ray

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November 6, 1998

cc w/encls:

Mr. R. W. Krieger, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, California 92674-0128

Resident Inspector/San Onofre NPS
c/o U.S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, California 92674

Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, California 92101

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, California 92672

Alan R. Watts, Esq.
Woodruff, Spradlin & Smart
701 S. Parker St. No. 7000
Orange, California 92668-4702

Mr. Dwight E. Nunn, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

Mr. Sherwin Harris
Resource Project Manager
Public Utilities Department
City of Riverside
3900 Main Street
Riverside, California 92522

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Mr. Michael Olson
San Onofre Liaison
San Diego Gas & Electric Company
P.O. Box 1831
San Diego, California 92112-4150

Mr. Steve Hsu
Radiologic Health Branch
State Department of Health Services
Post Office Box 942732
Sacramento, California 94234



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 144
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated May 11, 1998, as supplemented by letter dated October 9, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 144 , are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: November 6, 1998

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change.

REMOVE

3.6-2
3.6-6
3.6-14
5.0-20a

INSERT

3.6-2
3.6-6
3.6-14
5.0-20a
5.0-20b

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.1 Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program.</p>	<p>In accordance with the Containment Leakage Rate Testing Program</p>
<p>SR 3.6.1.2 Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.</p>	<p>In accordance with the Containment Tendon Surveillance Program</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 3.	6 hours
	<u>AND</u> D.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.2.1 -----NOTES-----</p> <p>1. An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test.</p> <p>2. Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1.</p> <p>-----</p> <p>Perform required air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program.</p>	<p>In accordance with the Containment Leakage Rate Testing Program</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.3.4 -----NOTES----- 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. SR 3.0.4 is not applicable. ----- Verify each containment isolation manual valve and blind flange that is located inside containment and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	<p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days</p>
<p>SR 3.6.3.5 Verify the isolation time of each Section A and B power operated and each automatic containment isolation valve is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.3.6 -----NOTES----- Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1. ----- Perform leakage rate testing for containment purge valves with resilient seals.</p>	<p>184 days <u>AND</u> Within 92 days after opening the valve</p>

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C tests and $\leq 0.75 L_a$ for the Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - 2) For each door, the leakage rate is $\leq 0.01 L_a$ when pressurized to ≥ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.
2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 135
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated May 11, 1998, as supplemented by letter dated October 9, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

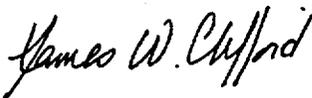
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 135 , are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and is to be implemented within 30 days of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: November 6, 1998

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change.

REMOVE

3.6-2
3.6-6
3.6-14
5.0-20a

INSERT

3.6-2
3.6-6
3.6-14
5.0-20a
5.0-20b

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.1.1 Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.1.2 Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.	In accordance with the Containment Tendon Surveillance Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 3.	6 hours
	<u>AND</u> D.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.2.1 -----NOTES-----</p> <ol style="list-style-type: none"> 1. An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. 2. Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1. <p>-----</p> <p>Perform required air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program.</p>	<p>In accordance with the Containment Leakage Rate Testing Program</p>

(continued)

FLANGE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>3.6.3.4 -----NOTES----- 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. SR 3.0.4 is not applicable. ----- Verify each containment isolation manual valve and blind flange that is located inside containment and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	<p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days</p>
<p>SR 3.6.3.5 Verify the isolation time of each Section A and B power operated and each automatic containment isolation valve is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.3.6 -----NOTES----- Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1 ----- Perform leakage rate testing for containment purge valves with resilient seals.</p>	<p>184 days <u>AND</u> Within 92 days after opening the valve</p>

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C tests and $\leq 0.75 L_a$ for the Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - 2) For each door, the leakage rate is $\leq 0.01 L_a$ when pressurized to ≥ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

1. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.
2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. NPF-15
SOUTHERN CALIFORNIA EDISON COMPANY
SAN DIEGO GAS AND ELECTRIC COMPANY
THE CITY OF RIVERSIDE, CALIFORNIA
THE CITY OF ANAHEIM, CALIFORNIA
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

On September 12, 1995, the U.S. Nuclear Regulatory Commission (NRC) approved issuance of a revision to 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors" which was subsequently published in the Federal Register on September 26, 1995, and became effective on October 26, 1995. The NRC added Option B, "Performance-Based Requirements," to allow licensees to voluntarily replace the prescriptive testing requirements of 10 CFR Part 50, Appendix J, with testing requirements based on both overall leakage rate performance and the performance of individual components.

By application dated May 11, 1998, as supplemented October 9, 1998, Southern California Edison Company (SCE or the licensee) requested changes to the Technical Specifications (TS) for the San Onofre Nuclear Generating Station, Unit Nos. 2 and 3 (SONGS). The requested changes would permit implementation of 10 CFR Part 50, Appendix J, Option B. The licensee has established a "Containment Leakage Rate Testing Program" and proposed adding this program to the TS. The program references Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, which specifies a method acceptable to the NRC for complying with Option B.

The supplemental letter dated October 9, 1998, corrected the definition of the peak containment internal pressure to be in accordance with 10 CFR Part 50, Appendix J, Option B. The revision did not change the no significant hazards consideration determination published in the Federal Register on September 9, 1998 (63 FR 48265).

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2.0 BACKGROUND

Compliance with 10 CFR Part 50, Appendix J, provides assurance that the primary containment, including those systems and components which penetrate the primary containment, do not exceed the allowable leakage rate specified in the TS and Bases. The allowable leakage rate is determined so that the leakage rate assumed in the safety analyses is not exceeded.

On February 4, 1992, the NRC published a notice in the Federal Register (57 FR 4166) discussing a planned initiative to begin eliminating requirements marginal to safety which impose a significant regulatory burden. Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," was considered for this initiative and the staff undertook a study of possible changes to this regulation. The study examined the previous performance history of domestic containments and examined the effect on risk of a revision to the requirements of Appendix J. The results of this study are reported in NUREG-1493, "Performance-Based Leak-Test Program."

Based on the results of this study, the staff developed a performance-based approach to containment leakage rate testing. On September 12, 1995, the NRC approved issuance of this revision to 10 CFR Part 50, Appendix J, which was subsequently published in the Federal Register on September 26, 1995, and became effective on October 26, 1995. The revision added Option B, "Performance-Based Requirements," to Appendix J to allow licensees to voluntarily replace the prescriptive testing requirements of Appendix J with testing requirements based on both overall and individual component leakage rate performance.

Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, was developed as a method acceptable to the NRC staff for implementing Option B. This regulatory guide states that the Nuclear Energy Institute (NEI) guidance document NEI 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," provides methods acceptable to the NRC staff for complying with Option B with four exceptions which are described therein.

Option B requires that Regulatory Guide 1.163 or another implementation document used by a licensee to develop a performance-based leakage testing program must be included, by general reference, in the plant TS. The licensee has referenced Regulatory Guide 1.163 in the proposed San Onofre TS 5.5.2.15.

Regulatory Guide 1.163 specifies an extension in Type A test frequency to at least one test in 10 years based upon two consecutive successful tests. Type B tests may be extended up to a maximum interval of 10 years based upon completion of two consecutive successful tests and Type C tests may be extended up to 5 years based on two consecutive successful tests.

By letter dated October 20, 1995, NEI proposed TS to implement Option B. After some discussion, the staff and NEI agreed on final model TS which were transmitted to NEI in a letter dated November 2, 1995. These TS are to serve as a model for licensees to develop plant-specific TS in preparing amendment requests to implement Option B.

In order for a licensee to determine the performance of each component, factors that are indicative of or affect performance, such as an administrative leakage limit, must be established. The administrative limit is selected to be indicative of the potential onset of component degradation. Although these limits are subject to NRC inspection to assure that they are selected in a reasonable manner, they are not TS requirements. Failure to meet an administrative limit requires the licensee to return to the minimum value of the test interval.

Option B requires that the licensee maintain records to show that the criteria for Type A, B and C tests have been met. In addition, the licensee must maintain comparisons of the performance of the overall containment system and the individual components to show that the test intervals are adequate. These records are subject to NRC inspection.

3.0 EVALUATION

The licensee's application for amendment dated May 11, 1998, proposes to establish a "Containment Leakage Rate Testing Program" and proposes to add this program to the TS. The program references Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, which specifies methods acceptable to the NRC for complying with Option B. This requires changes to existing TS 3.6.1.1, 3.6.2.1 and 3.6.3.6 and the addition of the "Containment Leakage Rate Testing Program" as TS Section 5.5.2.15. The corresponding Bases would also be modified.

Option B permits a licensee to choose Type A; or Type B and C; or Type A, B and C; testing to be done on a performance basis. The licensee has elected to perform Type A, B, and C testing on a performance basis.

While the proposed TS changes are consistent with the model TS provided in the staff's November 2, 1995 letter, differences were identified during the staff review and are discussed in the following Sections 3.1 and 3.2.

3.1 Interval Extension for Type A, B and C Containment Leak Rate Tests

The licensee proposed a Containment Leakage Rate Testing Program described in TS Section 5.5.2.15 in accordance with RG 1.163, dated September 1995. RG 1.163 states that NEI guidance document NEI 94-01, Rev. 0, provides a method acceptable to the NRC staff for complying with Option B, with exceptions noted in the RG. NEI 94-01, Rev. 0, specifies that the containment leak rate test intervals may be increased to certain nominal maximums based on performance, and then further extended by an additional marginal amount, consistent with standard scheduling practices for TS surveillance requirements. SCE proposed to identify these additional marginal interval extensions for Type A, B and C tests explicitly in TS Section 5.5.2.15. The model TS do not identify these interval extensions in the TS. Since the interval extensions are consistent with NEI 94-01, Rev. 0 as endorsed by RG 1.163 dated September 1995, the staff finds it acceptable to explicitly identify them within TS 5.5.2.15.

3.2 Peak Calculated Containment Internal Pressure

Appendix J, Option B of 10 CFR Part 50 defines "Pa" as "the calculated peak containment internal pressure related to the design basis loss-of-coolant accident as specified in the Technical Specifications." The SCE submittal dated May 11, 1998, proposed to define "Pa" in TS 5.5.2.15 as follows:

"The peak calculated containment internal pressure for the design basis Main Steam Line Break [MSLB], Pa, is 56.6 psig."

This proposed definition is not in accordance with the definition for "Pa" in 10 CFR Part 50, Appendix J, Option B since it defines "Pa" resulting from a design basis MSLB and not a design basis LOCA. For SONGS, the peak containment internal pressure that would result from a design basis MSLB in containment is calculated to be 56.6 psig. The SONGS peak containment internal pressure that would result from a design basis LOCA is calculated to be 55.1 psig, which is less than the MSLB related peak containment pressure. While both events would result in high containment pressures, the LOCA results in a much higher level of radioactive fission product release into the containment atmosphere. Therefore the regulation explicitly defines "Pa" based on a design basis LOCA.

The NRC staff discussed this with the licensee on September 16, 1998. In a subsequent submittal dated October 9, 1998, SCE revised the proposed definition of "Pa" in TS 5.5.2.15 to the following:

"The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, Pa, is 55.1 psig (Pa will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification)."

This proposed definition of "Pa" meets the requirements of 10 CFR Part 50, Appendix J, Option B. Therefore the staff finds this definition to be acceptable. For the purpose of containment testing, SCE will use the higher value that is based on the calculated peak containment pressure that would result from a design basis MSLB. Since this calculated pressure is greater than the calculated peak containment pressure that would result from a design basis LOCA, the staff finds leak testing containment at this higher pressure to be conservative, and therefore acceptable.

The staff finds that the TS changes proposed by the licensee meet the requirements of 10 CFR Part 50, Appendix J, Option B. The proposed TS changes are also consistent with both the guidance of Regulatory Guide 1.163 and the model TS provided in the staff's November 2, 1995 letter. The differences from the model TS discussed in Sections 3.1 and 3.2 do not alter the staff's conclusions.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 48265). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). This amendment also involves changes in record keeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Mel Gray

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